

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re: Equifax, Inc. Customer
Data Security Breach Litigation

MDL Docket No. 2800
No. 1:17-md-2800-TWT

This document relates to:

CONSUMER TRACK

**CONSENT MOTION TO EXTEND THE DEADLINE FOR DEFENDANTS
TO ANSWER THE CONSOLIDATED CONSUMER COMPLAINT**

Defendants Equifax Inc., Equifax Information Services LLC, and Equifax Consumer Services LLC (collectively, “Defendants”) respectfully submit this Consent Motion to Extend the Deadline for Defendants to Answer the Consolidated Consumer Class Action Complaint (the “Consolidated Consumer Complaint”), showing the Court as follows:

1. On April 4, 2018, the Court entered a Scheduling Order [Dkt. 260], which adopted the Parties’ Joint Preliminary Report and Discovery Plan [Dkt. 255] to govern various matters in this multidistrict proceeding.¹

2. On January 28, 2019, the Court dismissed the Consolidated Class

¹ On February 6, 2019, the parties submitted an Amended Joint Preliminary Report and Discovery Plain [Dkt. 543], but as of the date of this filing, it has not been adopted by the Court.

Action Complaint for Small Business Claims in its entirety [Dkt. 541] and granted in part and denied in part Defendants' motion to dismiss the Consolidated Consumer Complaint [Dkt. 540].

3. Under Federal Rule of Civil Procedure 12(a)(4)(A), the deadline for Defendants to answer the Consolidated Consumer Complaint is February 11, 2019.

4. Defendants seek a 14-day extension of time to answer the Consolidated Consumer Complaint, through and including February 25, 2019, to allow sufficient time for Defendants to address and respond to the non-dismissed allegations set forth in the Consolidated Consumer Complaint.

5. For the avoidance of doubt, Defendants seek only an extension of their answer deadline, and do not seek to alter or extend the discovery-related deadlines set forth in the Scheduling Order. *See also* Dkt. 543, Amended Joint Preliminary Report and Discovery Plan.

6. Counsel for Defendants and the Consumer Plaintiffs have conferred, and the Consumer Plaintiffs consent to the relief requested in this Motion.

THEREFORE, Defendants respectfully request that the Court extend the deadline for Defendants to answer the Consolidated Consumer Complaint through and including February 25, 2019. A proposed Order is attached for the Court's consideration.

Respectfully submitted this 6th day of February, 2019.

/s/ David L. Balser
KING & SPALDING LLP
David L. Balser
Georgia Bar No. 035835
Phyllis B. Sumner
Georgia Bar No. 692165
S. Stewart Haskins II
Georgia Bar No. 336104
Elizabeth D. Adler
Georgia Bar No. 558185
John C. Toro
Georgia Bar No. 175145
1180 Peachtree Street, N.E.
Atlanta, Georgia 30309
Tel.: (404) 572-4600
Fax: (404) 572-5140
dbalser@kslaw.com
psumner@kslaw.com
shaskins@kslaw.com
eadler@kslaw.com
jtoro@kslaw.com

Counsel for Defendants

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1D, the undersigned certifies that the foregoing complies with the font and point selections permitted by Local Rule 5.1B. This brief was prepared on a computer using the Times New Roman font (14 point).

DATED: February 6, 2019

/s/ David L. Balser
KING & SPALDING LLP

CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/s/ David L. Balser
KING & SPALDING LLP